

## RE: Fw: Signed Time Critical Removal Action memo for PCBs in the Road at Port Heiden/Receipt of Draft PCB Work Plan (Corrected)

Dave Bartus to: Howard, Louis R (DEC)
Cc: Daniel Duncan, Scott Downey

05/06/2011 05:07 PM

All in all, I think the Action Memorandum is well done (recognizing I'm not a CERCLA guy...), so you and the AF have my compliments on a job well done.

Have a great weekend.

Dave

"Howard, Louis R (DEC)" Well we had this out the door and signed... 05/06/2011 04:01:07 PM

From: "Howard, Louis R (DEC)" <louis.howard@alaska.gov>

To: Dave Bartus/R10/USEPA/US@EPA, Daniel Duncan/R10/USEPA/US@EPA

Cc: Scott Downey/R10/USEPA/US@EPA

Date: 05/06/2011 04:01 PM

Subject: RE: Fw: Signed Time Critical Removal Action memo for PCBs in the Road at Port Heiden/Receipt

of Draft PCB Work Plan (Corrected)

Well we had this out the door and signed in less than two weeks, so we were bound to miss something. Thanks for the information/clarification on TSCA jurisdiction. Will keep you informed of the progress as time goes by.

Louis Howard State of Alaska

Dept. of Environmental Conservation

Contaminated Sites Program

Federal Facilities Environmental Restoration

Anchorage AK 99501-2617 Phone: (907) 269-7552 Facsimile: (907) 269-7649 louis.howard@alaska.gov

555 Cordova St 2nd fl.

----Original Message----

From: Bartus.Dave@epamail.epa.gov [mailto:Bartus.Dave@epamail.epa.gov]

Sent: Friday, May 06, 2011 2:53 PM

To: Duncan.Daniel@epamail.epa.gov; Howard, Louis R (DEC)

Cc: Downey.Scott@epamail.epa.gov

Subject: Re: Fw: Signed Time Critical Removal Action memo for PCBs in the Road at Port Heiden/Receipt of Draft PCB Work Plan (Corrected)

Thanks, Louis. I had not been aware of the contamination on the road area of Port Heiden - while the PCB levels are not "screaming hot," the documented levels and extent of contamination certainly warrants the removal action. I have to admit, a \$7MM removal action is nothing to sniff at.

About the only issue I can see in the action memorandum is limiting TSCA jurisdiction to greater than 50 ppm soils. The definition of PCB remediation waste at 40 CFR 761.3 includes materials that are currently at concentrations less than 50 ppm, if they are from sources

unauthorized for use, as well as from sources >= 500 ppm beginning April 18, 1978, or >= 50 ppm beginning July 2, 1979. Given the history of Port Heiden, which the ROD documents as being in operation as late as 1981, it is possible some soils <50 ppm are regulated for disposal under 40 CFR 761.61. That said, the management requirements documented in the Action Memorandum appear to be in compliance with the disposal requirements for PCB remediation waste. These quirks of the definition of PCB remediation waste, however, should be kept in mind for future projects.

Generally, I'm pleased to see that the Air Force appears to be following the CERCLA process and properly addressing ARAR requirements in the CERCLA decision documents - definitely a welcome step in the right direction.

Dave

From: Daniel Duncan/R10/USEPA/US

To: Scott Downey/R10/USEPA/US@EPA, Dave Bartus/R10/USEPA/US@EPA

Date: 05/06/2011 02:32 PM

Subject: Fw: Signed Time Critical Removal Action memo for PCBs in

the

Road at Port Heiden/Receipt of Draft PCB Work Plan

(Corrected)

## Scott & Dave:

From: Daniel Duncan/R10/USEPA/US

To: Dave Bartus/R10/USEPA/US@EPA Cc: Scott Downey/R10/USEPA/US@EPA

Date: 05/06/2011 01:54 PM

Subject: Fw: Signed Time Critical Removal Action memo for PCBs in

the

Road at Port Heiden/Receipt of Draft PCB Work Plan

## Dave:

Here is the Signed Time Critical Removal Action Memo for PCBs in the Road at Port Heiden.

[attachment "06-May-2011 Signed Action Memo TCRA.pdf" deleted by Dave Bartus/R10/USEPA/US]

Background: As you will recall from our previous discussion with ADEC and their consultant the work to remove the PCBs in the road near the former Port Heiden Radio Relay Site (RRS). This is to allow access to this road this summer. The USAF is exercising a work plan under their CERCLA authority as a Time-Critical Removal Action (IR). TSCA in this case is an ARAR. This work will be conducted by the US Corps of engineers.

Today we received a copy of their DRAFT Work Plan fro this PCB Soil Removal Action.

Next Steps: Follow-up with ADEC and USCOE as needed. (Embedded image moved to file: pic14177.jpg) From the Desk Of: Daniel L. Duncan U.S. Environmental Protection Agency - Region 10 Office of Compliance and Enforcement 1200 Sixth Avenue, Suite 900, M/S OCE-084, Seattle, Washington 98101 (206) 553-6693 phone (206) 553-1775 FAX duncan.daniel@epa.gov ---- Forwarded by Daniel Duncan/R10/USEPA/US on 05/06/2011 11:42 AM From:

To:

"Howard, Louis R (DEC)" <louis.howard@alaska.gov> "Howard, Louis R (DEC)" <louis.howard@alaska.gov>, Kim Kearney <kkearney@northwind-inc.com>, "Ghebresllassie, Meseret C POA" <Meseret.C.Ghebresllassie@usace.army.mil>, "Crayton, Wayne POA" <Wayne.M.Crayton@usace.army.mil>, "Pflum, Ronald J POA" <Ronald.J.Pflum@usace.army.mil>, "Geist, Lisa K POA" <Lisa.K.Geist@usace.army.mil>, "Lee, Teresa POA" <Teresa.A.Lee@usace.army.mil>, "Riley, Pat POA" <Pat.Riley-Ramsey@usace.army.mil>, "Osgood, Gordon N POA" <Gordon.N.Osgood@usace.army.mil>, "Crapps, Earl L (DEC)" <earl.crapps@alaska.gov>, "Brewer, Marlena M (DEC)" <marlena.brewer@alaska.gov>, Jacques Gusmano/R10/USEPA/US@EPA, Ken Marcy/R10/USEPA/US@EPA, Gerda Kosbruk <pthgert@hotmail.com>, Lynn Carlson <lcarlson79@hotmail.com>, adriannechristensen@gmail.com, jameschris\_pth@hotmail.com, "Chapman, Judy (DOT)" <judy.chapman@alaska.gov>, September Myres <sbrod@sundance-inc.net>, Robert Myres <rmyres@sundance-inc.net>, Stephen Fusilier <Stephen\_Fusilier@blm.gov>, Larry Beck <Larry\_Beck@blm.gov>, Kishor Gala <kgala@northwind-inc.com>, "Carla J. Spires" <cspires@northwind-inc.com>, Arden Bailey <abailey@northwind-inc.com>, Ric Robinson/R10/USEPA/US@EPA,

"Grosse, Charles W. (ATSDR/DHAC/SRAB)" <ccg9@cdc.gov>, "Ha,

Nim (HSS) " <nim.ha@alaska.gov>

Cc: Roth Patrick <Patrick.roth@elmendorf.af.mil>, Daniel

Duncan/R10/USEPA/US@EPA

Date: 05/06/2011 11:39 AM

Subject: Signed Time Critical Removal Action memo for PCBs in the

Road at Port Heiden

Attached for your files and information is the signed version of the Time Critical Removal Action Memorandum to remove Polychlorinated Biphenyls (PCB) contaminated soil from the access road (shoulders and adjacent areas) running from the Port Heiden airport to the Port Heiden Radio Relay Station (RRS), Port Heiden, Alaska. For any questions on the 611th removal action, contact Pat Roth (907) 552-7893 or email him at Patrick.roth@elmendorf.af.mil

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